Appraisal Environmental and Social Review Summary

Appraisal Stage

(ESRS Appraisal Stage)

Date Prepared/Updated: 03/30/2020 | Report No: ESRSA00245
BASIC INFORMATION

A. Basic Project Data

<table>
<thead>
<tr>
<th>Country</th>
<th>Region</th>
<th>Project ID</th>
<th>Parent Project ID (if any)</th>
</tr>
</thead>
<tbody>
<tr>
<td>St. Lucia</td>
<td>LATIN AMERICA AND CARIBBEAN</td>
<td>P170860</td>
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Project Name: Caribbean Regional Air Transport Connectivity Project - St. Lucia

Practice Area (Lead): Transport

Financing Instrument: Investment Project Financing

Estimated Appraisal Date: 3/24/2020

Estimated Board Date: 5/28/2020

Borrower(s): St. Lucia

Implementing Agency(ies): Saint Lucia Air and Sea Ports Authority

Proposed Development Objective(s)

The Project Development Objectives (PDO) are to (i) improve operational safety and navigation efficiency of air transport and (ii) enhance resilience of St. Lucia’s airport infrastructure to natural disasters.

Financing (in USD Million)

<table>
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<th>Amount</th>
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<tr>
<td>Total Project Cost</td>
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B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?

No

C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]

The proposed Project would include five components: (i) Improvement of UVF runway safety and resilience; (ii) Modernization of air navigation systems; (iii) Institutional strengthening; (iv) Project management; and (v) Contingent emergency response.

D. Environmental and Social Overview
The proposed project will mainly be implemented in St. Lucia’s two existing airports: Hewanorra International Airport (UVF, IATA 3-letter code) and Georges FL Charles airport (SLU, IATA 3-letter code). In addition, the project will support installation of two Automatic Dependent Surveillance - Broadcast (ADS-B) antennae, which will be located outside of the airports. UVF is the main gateway to international destinations and is located at the southern end of the island in the town of Vieux Fort. UVF is approximately one-hour drive (approximately 53km away) from the capital city of Castries and an hour and a half drive from the main tourism centers located in the north of the island. The airport uses a single east–west runway, connected by two taxiways at its midsection, with turning bays at the end for back-tracking. The run-way is asphalt-surfaced and is 744m-long and 45m-wide, accommodating small and medium-sized aircraft. The airport has a single terminal used for both domestic and international operations. The airport was constructed in 1941. SLU is the smaller of two airports in Saint Lucia and mainly accommodates regional travel. It is situated on the northwest coast, about five minutes (approximately 2 km) from the downtown commercial centers of Castries. The runway of this airport runs parallel to Vigie Beach, one of the island's beaches that is popular with locals. The airport started operating from the 1950s.

Component 1 (US$ 32.5 million) focuses on the improvement of UVF Runway Safety and Resilience. It will support (i) rehabilitation runway and establishment of shoulders of at least seven and a half meters on each side; (ii) installation of an energy-efficient and disaster resilient LED lighting system; (iii) Runway End Safety Areas (RESAs) for both runway ends (for a total of 150 meters from the runway end); (iv) improvements of airfield drainage by rehabilitation and/or expansion of drainage canals/pipes in critical locations; and (v) Improvements for Crash Fire Rescue through strengthening capacity of firefighter management and control during emergency events, including providing full line of sight from the control room to the entire length of Runway and contributing to efficient management of emergency operation. The details of the above-mentioned activities under Component 1 are not known at the appraisal stage and the project will support engagement of several specialists during the project implementation for the detailed engineering design. A preliminary environmental and social assessment (ESA) was prepared based on the available information on the scope of the different activities and considers the World Bank’s Environmental, Health and Safety (EHS) General Guidelines and the specific Guidelines developed for Airports. The ESA will be updated at the detailed engineering design phase and this requirement has been reflected in the draft ESA and in the Environmental and Social Commitment Plan (ESCP).

Component 2 (US$ 4 million) aims to modernize the Air Navigation Systems and supports improvement of the operational safety and climate/disaster resilience of St. Lucia’s UVF runway which is its most critical piece of aviation infrastructure, and to support Saint Lucia’s compliance with ICAO Standards and Recommended Practices (SARPs). The Component includes (i) installation of an Instrument Landing System (ILS) for UVF Runway to provide a precision instrument approach to enhance safety during aircraft arrivals and also reduce delays, diversions, and cancellations in poor weather situations; (ii) introduction of Automatic Dependent Surveillance - Broadcast (ADS-B) for both airports by installing one or more ground stations; and (iii) carrying out Air Traffic Control (ATC)-related technical studies and update of UVF Aeronautical Charts. The ESA will include the first two activities of the component. As is the case with the physical works, details of the technical studies will be finalized at the project implementation and the requirements set out in paragraphs 14–18 of ESS1 will be applied to Technical Assistance (TA) activities as relevant and appropriate to the nature of the risks and impacts. The terms of reference, work plans or other documents defining the scope and outputs of TA activities will be reviewed so that the advice and other support provided are consistent with ESS 1–10.
Component 3 (US$ 8.5 million) includes institutional Strengthening and Project Management. It will also support analysis on recruitment, retention and promotion barriers for women in the aviation sector and development of a Gender Action Plan. Based on the results of the gap analysis specific studies and/or investments would be agreed upon and incorporated in the Project. Strengthening borrower capacity is a TA Type 3 activity and the requirements set out in paragraphs 14–18 of ESS1 will be applied to TA activities as relevant and appropriate to the nature of the risks and impacts.

The project also includes a Contingent Emergency Response (CERC) component, which would finance the implementation of emergency works, rehabilitation and associated assessments, at the Government’s request in the event of a disaster. The component would be triggered and disbursed in accordance with an Emergency Action Plan prepared by the Government of St. Lucia and the Bank’s CERC Guidance (Oct. 2017).

Both airports are on lands that have been heavily altered by human activity and are dedicated to transportation and industrial uses. The airports are adjacent to coastal and marine resources, for example UVF borders the La Tourney Nature Reserve (which includes a wetland) and the Point Sable Marine Protected Area (with reefs and beaches), and SLU is on the outskirts of Castries adjacent to a community cemetery and recreation beach. However, the civil works at UVF and SLU are within the footprints of the existing airports, and the preliminary ESA confirmed that project-induced impacts are not expected on the nature reserve and coastline.

Rehabilitation of the existing storm water drains at UVF will be done to improve safety during heavy rainfall events. To ensure that excess sediment or poor quality runoff does not affect nearby areas, and that flow volumes do not cause erosion or off-site effects, the design of the storm water drains may include retention basins, sediment traps, oil-water separators, or other measures to be define during the detailed design stage prior to undertaking any works. The ESA will be updated to assess the risk and impacts based on the detailed engineering design and technical specifications during the implementation phase.

In addition to project interventions within the existing airport perimeters, the project will support the installation of two antennae for the Automatic Dependent Surveillance – Broadcast (ADS-B) system. The antennae need to be placed on hilltops outside the existing airport properties, for which two tentative locations have been identified on existing communications tower facilities: (i) Tower on Moule-a-Chique south of UVF, which belongs to SLASPA; and, (ii) Tower near Light House at Vigie Hill north of SLU, which belong to Telephone/Communication companies.

The locations of the towers/antennae will be finalized during the detailed design based on the results of technical studies during implementation. In the unlikely event that the tentatively selected locations are not suitable and a new tower must be constructed to install the antenna, then it has been agreed that the SLASPA will screen out locations on land (public or private) and/or access roads where there could be informal users who have structures, crops or pasture animals on vacant areas, and will exclude any locations that could involve involuntary resettlement or impacts to natural habitat. The ESA will be updated accordingly to include an assessment of the environmental and social impacts of the proposed final ADS-B antenna locations.

The Bank will review the Environmental and Social Risk Classification (ESRC) on a regular basis throughout the project life cycle with special attention during detailed engineering design phase to ensure it continues to accurately reflect the level of risk the project presents.
In addition to the proposed World Bank funded CATCOP project, the Government of Saint Lucia is also planning to initiate a separate redevelopment project at UVF focusing mainly on construction of a new main terminal building, a new air traffic control tower, an extended apron (and associated drainage) as well as airside and landside infrastructure (e.g. carparks and access roads). The design stage is already well advanced with most, if not all, studies expected to be completed by mid-2020. However, due to financial constraints, no airfield safety and limited resilience improvements are envisioned under the planned investments while significant infrastructure deficiencies persist resulting in operational constraints and inefficiencies, safety concerns, and vulnerability to flooding associated to the annual rainy season, hurricanes, and climate change. The scope, timing and inter-dependence of the project with the bank funded project were reviewed. Although the activities will be implemented in the same airport, the scope of the works are different and there is no directly and significantly relationship between two projects. In addition, both the projects are not likely to be implemented on same timeframe. And again, the both the projects seem viable independently. Accordingly, it was determined that the redevelopment project will not be considered as ‘Associated Facilities’ since it does not meet all the three criteria of ‘Associated Facilities’ as per paragraph 11 and footnote 18 of ESS1. The PIU will follow proper communication approach to inform different stakeholders about the difference in scope and timing of the Bank funded project and the redevelopment project.

**D. 2. Borrower’s Institutional Capacity**

Both the airports are managed by the Saint Lucia Air and Sea Ports Authority (SLASPA), established by an Act of Parliament in 1983. The proposed Project would be implemented by the SLASPA, which will host a dedicated Project implementation Unit (PIU-SLASPA). The PIU-SLASPA will be responsible for management of all the project activities, including technical, procurement, financial management, monitoring and evaluation (M&E) and safeguard aspects (including citizen engagement). For the civil aviation related activities, the PIU will closely collaborate with the Civil Aviation Department of the Ministry of Economic Development, Housing, Urban Renewal, Transport and Civil Aviation. Furthermore, the project will also work together with Eastern Caribbean Civil Aviation Authority (ECCAA) on air transport regulations and certification.

The Project Implementation Unit (SLASPA-PIU) will engage an Environmental and Social Specialist within thirty (30) days after Project effectiveness for monitoring the implementation of the project and to ensure compliance with the ESMPs, ESCP, Labor Management Plan (LMP), and Stakeholder Engagement Plan (SEP). The Borrower will rely on the Environmental and Social Framework (ESF) of the Bank and will use the opportunity to build and strengthen their capacity to manage environmental and social risks. Accordingly, the project includes provision of capacity development of the client on environmental and social management. In addition, the contractor and supervision consultant will have dedicated staff for ESMP, SEP and other relevant subsidiary plans.

**II. SUMMARY OF ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS**

**A. Environmental and Social Risk Classification (ESRC)**

| Environmental Risk Rating | Moderate |

The environmental risk classification is Moderate under the World Bank’s Environmental and Social Framework based on the location, type, sensitivity and scale of the project intervention, nature and magnitude of potential ES risks and impacts, and client capacity and ownership. The focus of the project is to improve the safety and resilience against
disaster through physical improvement of runway and drainage facilities and installation of safety equipment. The proposed project will not support expansion or major rehabilitation of the existing airports. The physical works are mainly focused on improvement of the existing runway, construction of Runway End Safety Areas (RESAs) for both sides of the runway and rehabilitation of existing drainage facilities at Hewanorra International Airport (UVF). The scope of the runway improvement includes rehabilitation and upgrading of the runway surface and construction of shoulders on each side of at least seven and a half meters. The RESA will include 60 meters of paved stopway from each runway end and non-paved but reinforced grounds for at least another 90 meters (for a total of 150 meters from the runway end). In addition, the project includes equipment to improve traffic safety and efficiency in UVF and Georges FL Charles Airport (SLU).

The project locations are mainly within the already developed areas of the existing airport perimeters, and on two existing communications towers outside the airport boundaries. As mentioned earlier, UVF is bordered by the La Tournay Nature Reserve and Point Sable Marine Protected Area, and SLU is on the outskirts of Castries adjacent to a community cemetery and popular local beach; however, the project activities are limited to the existing site footprints, are limited in number, likely reversible in nature, and can be mitigated with measures that are readily identifiable and technically and economically feasible. Potential impact to areas outside the airport perimeters and communication towers is expected to be nil or minimal. In the unlikely event that a new ADS-B tower location is recommended by the technical studies during implementation, it will be screened for site access, land ownership and natural habitat to exclude any locations where involuntary resettlement or impacts to biodiversity or living resources could occur. The preliminary ESA confirmed that project-induced impacts are not expected on the nature reserves or coastlines adjacent to UVF, nor the cemetery and coastline adjacent to SLU. The airport areas are also fenced with restricted access, thus minimizing community health and safety risks.

**Social Risk Rating**

The social risk classification is Moderate. Permanent and/or temporary displacement are not expected from any of the project works or activities under Component 1. The physical work under Component 2 includes installation of an Instrument Landing System (ILS) for UVF Runway and ADS-B antennae. The tentatively selected locations of the ADS-B antennae are on public lands that do not require any involuntary resettlement. In the unlikely event that new antenna locations are recommended and new towers must be constructed, the project will screen out activities that could take place on land (public or private) where there could be informal users who have structures, crops or pasture animals on vacant areas. Any activity that could require involuntary resettlement will be screened out and will not be eligible for financing under the project.

Some occupational health and safety risks are associated with the hiring of an estimated 20 to 50 low skill workers coming from local communities. There are also potential risks related to the primary suppliers for raw materials like sand or aggregate for the resurfacing of the airport runway. The project will implement labor management and Occupational Health and Safety (OHS) procedures, a grievance mechanism for workers, and due diligence of primary supplies to prevent the use of all forms of forced labor and child labor as well as other pertinent instruments to address these potential risks.

The Bank will review the Environmental and Social Risk Classification (ESRC) on a regular basis throughout the project life cycle to ensure that it continues to accurately reflect the level of risk the project presents.
B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

**Overview of the relevance of the Standard for the Project:**

The standard is relevant for the project. Although the proposed project is likely to reap positive environmental and social benefits through enhancing safety and resilience at the two existing airports, the project has some moderate environmental and social risks associated with the physical upgrading of the UVF existing runway and improvement of air traffic safety and efficiency system in both airports. The project sites are already developed as airport facilities or communications towers and are highly modified from the natural condition.

The implementing agency has carried out a preliminary Environmental and Social Assessment (ESA) of the proposed project based on the current available information. The ESA includes assessment of the project-induced environmental and social impacts and associated risks based on the currently available design information to ensure that the project will be environmentally and socially sound and sustainable. The preliminary ESA confirms that the impacts are not significant for the proposed project and can be mitigated with standard mitigation practices. The ESA includes three separate ESMPs for the airports and off-site ADS-B towers, as well as a Monitoring Plan. The detailed engineering design of the proposed civil works and specifications of the equipment and installation will be carried out after project approval, and the ESA and ESMPs will be further updated at the detailed design stage as stated in the preliminary ESA. The updated ESMP will be developed in accordance with the World Bank’s EHS General Guidelines with specific consideration of the Guidelines on Airports. In addition, the contractors will prepare a Contractor’s Environmental and Social Management Plan (C-ESMP) before execution of any physical works. In addition the following plans will be prepared during the detailed design: (i) Waste Management Plan (WMP); (ii) Hazardous Materials Control Plan (HMCP); (iii) Pollution Management Plan (PMP); (iv) Emergency Response Plan (ERP); (v) Traffic and Road Safety Plan (TRSP); (vi) Community Health and Safety Plan (CHSP); (vii) Security Plan (SP), if required; (viii) Stormwater, sediment and erosion control plan (SWSECP); and (ix) Biodiversity Conservation Plan (BCP), if required.

The project is not likely to contribute significantly to impacts from airport operations since the project focus is limited to enhancing safety and resilience, rather than increasing traffic or use. However, the updated ESA will consider any operational phase issues to inform design of the civil works and their subsequent operation and maintenance.

To ensure that the Contingency Emergency Response Component (CERC) Component complies with the requirements of the World Bank Environment and Social Standards, the ESA has included possible post-disaster related activities, list of negative activities, potential environmental and social impacts and process to be followed for a rapid environmental and social assessment.

ESS10 Stakeholder Engagement and Information Disclosure

The standard is relevant. The main stakeholders are Government workers and officials as well as the nearby communities and the general public who will make use of airport transportation services. Government agencies that
will be involved are: Ministry of Infrastructure, Ports, Energy and Labour; Ministry of Finance, Economic Growth, Job Creation, External Affairs and the Public Service; Ministry of Infrastructure, Ports, Energy and Labour; Ministry of Agriculture, Fisheries, Physical Planning, Natural Resources and Co-operatives; Ministry of Health and Wellness; Ministry of Education, Innovation, Gender Relations and Sustainable Development; Ministry of Tourism, Information and Broadcasting, Eastern Caribbean Civil Aviation Authority (ECCAA), the Chamber of Commerce, among others.

The Government has prepared a Stakeholder Engagement Plan (SEP) that outlines a) who the key stakeholders are; b) how they are to be engaged; c) how often the engagement will occur throughout the project; d) how feedback will be solicited, recorded and monitored over the project; e) who will be responsible for this engagement; and, f) timeline and budget. The process of stakeholder engagement has begun during preparation and will continue into implementation with the following measures: i) stakeholder identification and analysis and ii) planning the engagement with stakeholders, and iii) consultation with stakeholder. The client will publish the draft SEP and ESA and hold public consultations. The SEP will be updated from time to time as/if necessary, and if significant changes are made then the Borrower will redisclose the updated documents. The SEP describes the measures that will be used to remove obstacles to participation, and how the views of differently affected groups will be captured. There is a Grievance Redress Mechanism (GRM) that will be used to receive and facilitate the resolution of concerns and grievances. The nature of eligible grievances under the GRM is part of the SEP.

B.2. Specific Risks and Impacts

A brief description of the potential environmental and social risks and impacts relevant to the Project.

ESS2 Labor and Working Conditions

This standard is relevant given that the project will hire direct workers that will be engaged directly by the Borrower to work specifically in relation to the project. Some specialized personal may be hired to install state of the art safety equipment and for training to enhance capacity building. The project will also be engaged with contracted workers who are people employed or engaged through third parties for different aspects of project implementation including resurfacing of airport runway. An estimate of 50 workers could be hired by the project, for the resurfacing of the runway.

To prevent against the risk of child labor or forced labor related to primary supply workers, specifically to provide raw material like sand for the resurfacing of the runway, the Borrower will require the primary supplier to identify those risks and take appropriate steps to remedy them consistent with its Labor Management Procedure. The Borrower will monitor primary suppliers, and in case of child and force labor, will require the primary supplier to take appropriate steps to remedy them, as well as any significant risk of safety issues related to primary supply workers. Such procedures and mitigation measures will be reviewed periodically to ascertain their effectiveness. Where remedy is not possible, the Borrower will, within a reasonable period, shift the project’s primary suppliers to suppliers that can demonstrate that they are meeting the relevant requirements of this ESS.

The project does not intend to include the use of community workers. Government civil servants are expected to work in connection with the project, whether full-time or part-time. They will remain subject to the terms and conditions of their existing public-sector employment agreement or arrangement, unless there has been an effective
legal transfer of their employment or engagement to the project. ESS2 will not apply to such government civil servants, except for the provisions of Protecting the Work Force Occupational Health and Safety and child and forced labor.

The LMP that has been developed as an annex to the ESA addresses the following risks: i) Health screening and monitoring where appropriate, ii) Protective measures for hazardous conditions or substances, iii) Worker training, iv) Accident and incident monitoring procedures, v) Emergency response procedures vi) Remedies for adverse environmental or social impacts, vii) Terms and conditions of employment such as rights to regular payment hours of work, overtime, adequate rest, benefits such as annual, sick, maternity, and family leave and timely notice of termination, viii) Non-discrimination and equal opportunity, and provisions for all aspects of employment including measures to prevent and address harassment, intimidation and or exploitation, ix) Prohibitions against child labor and forced labor; and ix) Access to grievance mechanisms specifically for direct and contracted labor. The LMP is considered a living document and will be reviewed and updated as necessary throughout the development and implementation of the project.

ESS3 Resource Efficiency and Pollution Prevention and Management

The standard is relevant to avoid or minimize project-related emissions and generation of waste, and to promote the sustainable use of energy.

The physical interventions at the airports will generate construction debris and hazardous or non-hazardous waste such as wastewater, fuel, asphalt, chemicals, wood and building materials, among others. The project will promote proper waste management practices as part of the Environmental and Social Management Plans (ESMPs) to help minimize hazardous and nonhazardous waste production and appropriate management of wastes. The ESMPs outline the requirements for debris and waste management of the proposed project works, and point to opportunities for improvements during the operations stage. Appropriate waste management measures will be reflected in the contract documents to ensure the requirements to manage waste from construction operations, including identification of the end location of the waste removed. The following plans related to ESS3 will be prepared prior to beginning of any physical works: (i) Waste Management Plan (WMP); (ii) Hazardous Materials Control Plan (HMCP); (iii) Pollution Management Plan (REPMP); (iv) storm water, sediment and erosion control plan (SWSECP).

The technical specifications of different equipment will promote energy efficiency and measures to reduce GHG emissions. The project will use energy efficient Light Emitting Diode (LED) bulbs in runway lighting, using specifications available at the detailed design stage. The project will not undertake GHG accounting given the negligible change in emissions from the project.

Based on a preliminary visual inspection during site visits to develop the ESA, there are no contaminated soils or water that are likely to be encountered during the works. Firefighting training areas that could contain foam (AFFF) are located at a distance from the runways, and storage tanks for jet fuel and hydrocarbons are also some distance from the runways. However, there is reportedly an abandoned fuel line which crosses beneath the runway at UVF. If the abandoned line is uncovered during excavation, it will be carefully screened for residual hydrocarbon contamination using the training and protocols referred to in the ESMPs. Further, the Monitoring Plan requires...
chemical analysis for petroleum hydrocarbon contamination in areas where soil excavation will occur. Any contaminated soils or materials will be handled, stored, and disposed of appropriately. The project will also require the use of other hazardous materials such as asphalt, paints and other chemicals which must be appropriately managed by SLASPA at both airport facilities.

**ESS4 Community Health and Safety**

The Standard is relevant considering the civil works at UVF, the installation of equipment at both airports, and the ADS-B antenna installation outside the airports. Although the work will be confined to the existing and secured areas of the two airports and communications tower facilities, some of the associated activities such as transportation of construction materials, machinery and equipment may increase the risk of traffic hazard and associated incidents. In addition, there would be community health and safety risk if unauthorized people enter work zones.

The ESMPs outline the measures to reduce the community health and safety measures especially establishment of a security perimeter around the construction (rehabilitation) sites to minimize the risks of injury or accidental exposure to hazards, through measures such as signage and temporary fencing. SLASPA will prepare a Community Health and Safety Plan prior to initiating any physical works.

SLASPA will rely on its existing airport security personnel for work-related security and safety; however, if additional security personnel are required for the project, then SLASPA will prepare a Security Plan. The plan will describe the processes to: (i) make reasonable inquiries to verify that the direct or contracted workers to provide security are not implicated in past abuses; (ii) train them adequately (or determine that they are properly trained) in the use of force (and where applicable, firearms), and appropriate conduct toward workers and affected communities; and (iii) require them to act within the applicable law. SLASPA will review all allegations of unlawful or abusive acts of security personnel, act (or urge appropriate parties to act) to prevent recurrence and, where necessary, report unlawful and abusive acts to the relevant authorities, if and as required.

The Contractor will put into place a Traffic and Road Safety Plan to ensure that trucks unloading equipment do not cause traffic jams and ensure that equipment and supplies can be safely offloaded. In addition, the ESMPs focus on the potential risks from increased traffic and heavy equipment operations in and around the airports.

The ESMPs also include mitigation measures for storage, handling, transportation and disposal of hazardous materials such as fuels. SLASPA will prepare an Emergency Response Plan prior to beginning any works to ensure that these aspects are addressed in accordance with the ESMPs.

In summary, the borrower will prepare the following plans prior to beginning any physical works as related to ESS4: (i) Emergency Response Plan (ERP); (ii) Traffic and Road Safety Plan (TRSP); (iii) Community Health and Safety Plan (CHSP); and (iv) Security Plan (SP) as required.
ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

The standard is currently not relevant. No project-related land acquisition or restrictions on land use will take place and therefore, there is no potential for physical displacement (relocation, loss of residential land or loss of shelter) or economic displacement (loss of land, assets or access to assets, leading to loss of income sources or other means of livelihood). Based on the initial assessment, no legacy issue have been identified with the airport that the WB needs to be aware of.

The tentatively selected locations for both ADS-B antennae are on existing communications towers with established access routes. These locations are on public lands free from encumbrance. The locations of the antennae will be confirmed during the detailed design stage based on output from technical studies funded under Component 2. In the unlikely event that a new location is proposed where there is no existing tower, then SLASPA will screen out locations that could take place on land (public or private) where there could be informal users who have structures, crops or pasture animals on vacant areas. Any activity that could require involuntary resettlement will be screened out and will not be eligible for financing under the project. These aspects will be included in the update to the ESA once the detailed design information is known.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

Although impacts on biodiversity and living natural resources are not expected, care must be taken given that there are sensitive environments adjacent to UVF such wetlands (the La Tourney Natural Area) and marine and coastal habitat (the Point Sable Marine Reserve). Further, the project activities at UVF will be restricted within the airport boundaries and therefore no potential direct or indirect project-induced impacts are expected to the PSMA or to the La Tourney Preserve. This will again be confirmed during the detailed design stage and the corresponding ESA update. If any significant impact identified, a biodiversity conservation plan will be prepared as part of the updated ESMP.

Measures to avoid or address such impacts are included in the ESMP for the UVF, including strict runoff and erosion/sedimentation control plans for these civil works. The ESMP provides guidance, including an evaluation of the systems and verification practices used by the primary suppliers, to ensure that any natural resource commodities will not result in any significant conversion or significant degradation of natural or critical habitats due to the physical work at the UVF. Primary suppliers, of sand for example, will be verified to ensure that raw materials are sourced taking the provisions of ESS6 into consideration. Ultimately, the SLASPA will identify where the supply is coming from and ensure that natural habitats are not affected in accordance with ESS6.

The ESMPs for all facilities also consider incursions of domestic animals or wildlife and bird strikes. SLASPA has developed a bird and wildlife management program that is consistent with ICAO and the World Bank EHS Guidelines for Airports, including a Bird and Wildlife Control Committee and Airport Assistants with the responsibility for bird and wildlife control at the aerodromes. Areas for improvement may be identified throughout the project review for operational strengthening and planning that may reinforce alternative analysis covering possible impacts on terrestrial and marine habitats as well as migratory birds and flyways. These controls will be applied during the construction as well as operation phases.
ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities

The Standard is not currently relevant. There are no persons who meet the definition of indigenous people present in the project’s area of influence.

ESS8 Cultural Heritage

The Standard is relevant. The project does not envisage any impacts on physical, cultural, and/or archaeological sites, because works will take place on already developed lands. However, some physical infrastructure works require excavation below ground, so the standard is considered relevant. SLASPA will rely on a chance finds procedure contained as a precaution in the project’s ESMPs and as part of construction contracts to be awarded under the project.

Given present design there is no potential for the Choc Cemetery and Vigie Lighthouse near SLU to be affected during the project. This will be further verified during the design phase and measures included in the ESMP as a precaution if necessary. Historical resources have been identified near the existing communications tower at Moule-a-Chique near UVF. These will be avoided by using the existing access road and tower and will be verified during the detailed design phase.

ESS9 Financial Intermediaries

The standard is currently not relevant, as there are no FIs involved in the project.

B.3 Other Relevant Project Risks

To date there are no additional risks or impacts that have been identified.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways

No

OP 7.60 Projects in Disputed Areas

No

III. BORROWER’S ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

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<th>DELIVERABLES against MEASURES AND ACTIONs IDENTIFIED</th>
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<td>ESS 1 Assessment and Management of Environmental and Social Risks and Impacts</td>
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<tr>
<td>Environmental and Social Assessment (ESA)</td>
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<td>Environmental and Social Management Plans</td>
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<td>Contractor ESMP</td>
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<td><strong>ESS 10 Stakeholder Engagement and Information Disclosure</strong></td>
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<td>Stakeholder Engagement Plan (SEP).</td>
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<td>Grievance mechanism, as described in the SEP.</td>
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<td><strong>ESS 2 Labor and Working Conditions</strong></td>
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<td>Labor Management Procedure (LMP)</td>
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<td><strong>ESS 3 Resource Efficiency and Pollution Prevention and Management</strong></td>
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<td>Waste Management Plan.</td>
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<td>Hazardous Materials Control Plan.</td>
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<td>Resource efficiency and pollution prevention and management measures consistent with the updated ESMPs.</td>
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<td>Security plan, if required</td>
<td>12/2020</td>
</tr>
<tr>
<td><strong>ESS 5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement</strong></td>
<td></td>
</tr>
<tr>
<td><strong>ESS 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources</strong></td>
<td></td>
</tr>
<tr>
<td>Biodiversity conservation plan, if required.</td>
<td>12/2020</td>
</tr>
<tr>
<td><strong>ESS 7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities</strong></td>
<td></td>
</tr>
<tr>
<td><strong>ESS 8 Cultural Heritage</strong></td>
<td></td>
</tr>
<tr>
<td>Chance find procedure</td>
<td>03/2020</td>
</tr>
</tbody>
</table>
B.3. Reliance on Borrower’s policy, legal and institutional framework, relevant to the Project risks and impacts

Is this project being prepared for use of Borrower Framework?  
No

Areas where “Use of Borrower Framework” is being considered:
None.

IV. CONTACT POINTS

World Bank

Contact: Kavita Sethi  
Title: Senior Transport Economist

Telephone No: 458-7558  
Email: ksethi@worldbank.org

Contact: Malaika Becoulet  
Title: Transport Specialist

Telephone No: 5727+2214 /  
Email: mbecoulet@worldbank.org

Contact: Satoshi Ogita  
Title: Senior Transport Specialist

Telephone No: 458-7332  
Email: sogita@worldbank.org

Borrower/Client/Recipient

Borrower: St. Lucia

Implementing Agency(ies)

Implementing Agency: Saint Lucia Air and Sea Ports Authority

V. FOR MORE INFORMATION CONTACT

The World Bank
1818 H Street, NW
Washington, D.C. 20433
Telephone: (202) 473-1000
Web: http://www.worldbank.org/projects

VI. APPROVAL

Task Team Leader(s): Kavita Sethi, Malaika Becoulet, Satoshi Ogita